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Attorneys for: Plaintiffs KAREN DI PIAZZA,  
Individually and as Mother to CORBIN JAEGER and as Personal  
Representative of the Estate of CORBIN LEE JAEGER, Deceased

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF TEXAS, LUBBOCK DIVISION**

KAREN DI PIAZZA, Individually and As  
Mother to CORBIN JAEGER and As  
Personal Representative of the Estate of  
CORBIN LEE JAEGER, Deceased,

Plaintiff,

v.

WEATHER GROUP TELEVISION, LLC  
dba THE WEATHER CHANNEL, a  
Georgia limited liability company;  
WEATHER GROUP, LLC, a Delaware  
limited liability company; CF  
ENTERTAINMENT, INC. dba  
ENTERTAINMENT STUDIOS, a California  
corporation; ENTERTAINMENT STUDIOS  
NETWORKS, INC., a California  
corporation; ENTERTAINMENT STUDIOS  
MEDIA, INC., a California corporation;  
ENTERTAINMENT STUDIOS MEDIA  
HOLDINGS, INC., a Delaware corporation;  
NBCUNIVERSAL MEDIA, LLC, a  
Delaware limited liability company; BAIN  
CAPITAL INVESTORS, LLC, a Delaware  
limited liability company; THE  
BLACKSTONE GROUP, INC., a Delaware  
corporation; TV HOLDINGS 1, LLC, a  
Delaware limited liability company; TV  
HOLDINGS 2, LLC, a Delaware limited

**CIVIL ACTION**

**CASE NO. 5-19CV0060-C**

**PLAINTIFF KAREN DI PIAZZA,  
INDIVIDUALLY AND AS MOTHER TO  
CORBIN JAEGER AND AS PERSONAL  
REPRESENTATIVE OF THE ESTATE  
OF CORBIN LEE JAEGER,  
DECEASED'S RULE 26(a)(2)(B)  
DISCLOSURE OF EXPERT  
TESTIMONY**

liability company; TV SPINCO LLC, a  
Delaware limited liability company;  
SHEENA BITTLE as Personal  
Representative of the Estate of KELLEY  
GENE WILLIAMSON; KEITH DANIELS as  
Personal Representative of the Estate of  
RANDALL D. YARNALL,

Defendants.

**PLAINTIFF KAREN DI PIAZZA, INDIVIDUALLY AND AS MOTHER TO CORBIN  
JAEGER AND AS PERSONAL REPRESENTATIVE OF THE ESTATE OF CORBIN  
LEE JAEGER, DECEASED'S RULE 26(a)(2)(B) DISCLOSURE OF EXPERT**

**TESTIMONY**

TO THE HONORABLE JUDGE OF SAID COURT:

In accordance with Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, Plaintiff Karen Di Piazza, individually and as Mother to Corbin Jaeger and as Personal Representative of The Estate of Corbin Lee Jaeger, Deceased's ("Plaintiff") Rule 26(a)(2)(B) Disclosure of Expert Testimony respectfully submits to the Court and provide to Defendants Weather Group Television, LLC dba The Weather Channel, et al. Pretrial Disclosures, consisting of the following persons who may be used at trial or in discovery to present evidence under Rules 702, 703, or 706 of the Federal Rules of Evidence.

**I.**

**EXPERT WITNESSES RETAINED BY PLAINTIFF**

At this time, Plaintiff has not retained or specially employed anyone to provide expert testimony in this action.

**II.**

**NON-RETAINED EXPERTS WHO MAY PROVIDE EXPERT TESTIMONY**

1. Nathaniel L. Washburn  
And other representatives of  
Texas Highway Patrol Division  
Dept of Public Safety, State of Texas including, but not limited to:

1 Jerry D, Johnson  
2 Roger Medrano  
3 Frank Mosher  
4 Andrew Wilson  
5 215 South Berkshire  
6 Crosbyton, TX 78773-0140 (806) 675-2131  
7 J. Bratcher  
8 1212 Houston Street  
9 Levelland, TX 79336 (806) 894-7026

10 Nathaniel L. Washburn is the Texas Highway Patrol Division Trooper who  
11 responded to the crash that killed Corbin Jaeger and investigated the matter. Trooper  
12 Washburn is expected to testify about his observations at the scene and investigation into  
13 the crash, including, but not limited to, the cause of the collision, the relative speeds of the  
14 vehicles involved immediately beforehand and any violations of traffic safety laws that  
15 contributed to the accident. Trooper Washburn, as well as the other members of the Texas  
16 Highway Patrol identified above may be deposed. For further information concerning  
17 Trooper Washburn's opinions and qualifications, see the Major Crash Investigation Report  
18 dated April 11, 2018 prepared by Trooper Washburn related to the fatal March 28, 2017  
19 automobile accident, which is the subject of these proceedings. See also DI PIAZZA  
20 000147-000553, all of which materials previously have been served upon the parties in  
21 discovery. It is anticipated that other law enforcement officers assisted in the investigation  
22 and will be expected to testify as to their involvement.

23 **2.** Thomas R. Parsons, M.D., F-ASCP, D-ABP (AP/CP/FP), Forensic  
24 Pathologist South Plains Forensic Pathology  
25 202 Avenue Q  
26 Lubbock, Texas 79415  
27 (806) 790-9611

28 Dr. Parsons is expected to present evidence about the autopsy he performed on  
Corbin Jaeger and his findings, opinions, and conclusions based upon that autopsy and  
any information that may have been provided to Dr. Parsons about the crash occurrence  
made the basis of this action or the investigation of that occurrence which has an impact

1 on his findings, opinions, and conclusions. It is expected that Dr. Parsons will testify,  
2 among other things, about whether Corbin Jaeger experienced any conscious physical  
3 pain or emotional pain, torment, and suffering as a result of the crash occurrence made  
4 the basis of this action; the cause of his death; the manner of his death; the mechanism  
5 of his death; and the time of his death with respect to the trauma that caused it. For further  
6 information concerning Dr. Parson's qualifications and opinions, see his May 20, 2017  
7 correspondence to Karen Di Piazza and his April 10, 2017 Autopsy Report. See also DI  
8 PIAZZA 000701-000708, all of which materials previously have been served upon the  
9 parties in discovery.  
10  
11

12           **3.**     Judge Nancy Stone  
13                     Justice of the Peace  
14                     508 Crow Street  
                      Dickens, Texas 79229 (806) 623-5233

15           It is expected that Ms. Stone will testify about her investigation, in her capacity as  
16 a Justice of the Peace, of the death of Corbin Jaeger, and the subject matter addressed  
17 and reported by her in Corbin Jaeger's death certificate including the immediate cause of  
18 his death and the approximate interval between onset of the immediate cause of death  
19 and death. For further information concerning Ms. Stone's opinions and observations, see  
20 the Certificate of Death, State File Number 142-17-078956, issued June 1, 2027. See also  
21 DI PIAZZA 00090, all of which materials previously have been served upon the parties in  
22 discovery.  
23

24           **4.**     Lanny Dean  
25                     167 Cody Dr.  
26                     Rogersville, MO 65742 (918) 865-2959  
27  
28

1 Mr. Dean holds a Bachelor of Science degree in Electrical Engineering and is in the  
 2 process of obtaining a Bachelor of Science degree in Meteorology. He is a photojournalist,  
 3 non-degree meteorologist and a twenty-nine (29) year storm chasing tours veteran. He is  
 4 the owner and lead forecasting guide of Extreme Chase Tours, a company that offers  
 5 storm chasing tours. It is expected that Mr. Dean will testify as to his personal observations  
 6 of the driving habits of Kelley Williamson and Randall Yarnall and his communications with  
 7 individuals at The Weather Channel related to same. He may also provide opinions as to  
 8 safety standards related to storm tracking within the storm tracking community and  
 9 Messrs. Williamson and Yarnall repeated violations of those standards, inclusive of  
 10 violating traffic safety laws and proper positioning when tracking tornados. For further  
 11 information concerning Mr. Dean's qualifications, observations and opinions see his  
 12 declaration in support of PLAINTIFF KAREN DI PIAZZA, INDIVIDUALLY AND AS  
 13 MOTHER TO CORBIN JAEGER AND AS PERSONAL REPRESENTATIVE OF THE  
 14 ESTATE OF CORBIN LEE JAEGER, DECEASED'S OPPOSITION TO DEFENDANT  
 15 WEATHER GROUP TELEVISION, LLC'S MOTION FOR SUMMARY JUDGMENT. See  
 16 also Document 141-1, pp. 67-92.

20 5. John Haxby  
 21 2720 North 74<sup>th</sup> Street  
 22 Lincoln, NE 68507 (402) 525-4065

23 Mr. Haxby has over forty years work experience as a photojournalist with various  
 24 media companies and as a freelance photojournalist. He is also an experienced storm  
 25 tracker. It is expected that Mr. Haxby will testify as to his personal observations of the  
 26 driving habits of Kelley Williamson and Randall Yarnall and his communications with  
 27 individuals at The Weather Channel related to same. He may also provide opinions as to  
 28

1 safety standards related to storm tracking within the storm tracking community and  
2 Messrs. Williamson and Yarnall violations of those standards. For further information  
3 concerning Mr. Haxby's qualifications, observations and opinions see his deposition taken  
4 in these proceedings.  
5

6           **6.**       Kathryn Prociv  
7                   5315 Chandley Farm Circle  
8                   Centreville, VA 20120 (703) 988-9267

9           Ms. Prociv is currently a meteorologist and producer for NBC News. She has been  
10 certified by the American Meteorological Society as a Certified Consulting Meteorologist.  
11 At the time of the automobile accident that is the subject of these proceedings, she was  
12 employed as a weather producer with The Weather Channel. It is expected that Ms. Prociv  
13 will testify as to her personal observations of the storm positioning habits of Kelley  
14 Williamson and Randall Yarnall and her communications with individuals at The Weather  
15 Channel related to same. She will also testify about complaints she received from third  
16 parties related the driving habits of Messrs. Williamson and Yarnall and her  
17 communications with individuals at The Weather Channel related to same. She may also  
18 provide opinions as to safe practices utilized by storm trackers when tracking tornados  
19 and Messrs. Williamson and Yarnall's failure to adhere to those standards on multiple  
20 occasions. For further information concerning Ms. Prociv's qualifications, observations  
21 and opinions see her deposition taken in these proceedings.  
22  
23

24           **7.**       Douglas S. Kiesling  
25                   56 South 33rd Avenue, Suite 338  
26                   St. Cloud, MN 56301 (651) 238-0258

27           Mr. Kiesling has over twenty years of experience filming and photographing storms  
28 and severe weather events. He is the owner and president of StormChasingVideo.com,

1 LLC, a Minnesota limited liability company (hereafter "SCV"), which has been in business  
 2 for over nineteen years. SCV operates as a broker between approximately sixty freelance  
 3 videographers and photographers and television news networks to facilitate the sale of  
 4 severe weather footage from freelancers to the news networks and archived clients. It is  
 5 expected that Mr. Kiesling will testify as to his personal observations of the driving habits  
 6 of Kelley Williamson and Randall Yarnall and his communications with individuals at The  
 7 Weather Channel related to same. He may also provide opinions as to safety standards  
 8 related to storm tracking within the storm tracking community and Messrs. Williamson and  
 9 Yarnall repeated violations of those standards, inclusive of violating traffic safety laws. For  
 10 further information concerning Mr. Dean's qualifications, observations and opinions see  
 11 his declaration in support of PLAINTIFF KAREN DI PIAZZA, INDIVIDUALLY AND AS  
 12 MOTHER TO CORBIN JAEGER AND AS PERSONAL REPRESENTATIVE OF THE  
 13 ESTATE OF CORBIN LEE JAEGER, DECEASED'S OPPOSITION TO DEFENDANT  
 14 WEATHER GROUP TELEVISION, LLC'S MOTION FOR SUMMARY JUDGMENT. See  
 15 also Document 141-3, pp. 343-348.

### 19 III.

#### 20 **OTHER EXPERTS**

21 Although not subscribing to or endorsing the opinions thereof, the qualifications  
 22 thereof, the relevancy thereof or the reliability thereof, Plaintiff reserves the right to and  
 23 does hereby cross-designate as adverse expert witnesses, those expert witnesses who  
 24 have been identified by the Defendants. Plaintiff does not waive any challenge to the  
 25 qualifications of these experts to render such opinions or any other legal challenge to  
 26 such opinions. Through this designation, Plaintiff does not necessarily agree with nor  
 27 vouch for the qualifications or credibility of any such witnesses or their opinions or the  
 28

1 reliability, materiality, or admissibility of information and/or tangible things produced by  
2 these individuals in general; through this designation, Plaintiff reserves the opportunity to  
3 rely upon or elicit certain opinions and/or evidence from these witnesses to the extent  
4 Plaintiff elects to do so.

5 **IV.**

6 Plaintiff reserves the right to call undesignated, rebuttal expert witnesses and/or  
7 fact witnesses, whose testimony cannot reasonably be foreseen until the presentation of  
8 the evidence at trial.

9 **V.**

10 Plaintiff reserves additional rights and privileges she has or may have with regard  
11 to expert witnesses, pursuant to the Federal Rules of Civil Procedure, the Federal Rules  
12 of Evidence, the case law constituting same, and any rulings or orders of this Court.

13 DATED: October 6, 2020

LAW OFFICES OF ROBERT A. BALL

14  
15 By: /s/ Robert A. Ball

16 ROBERT A. BALL, SBN (CA) 00761  
17 JOHN M. DONNELLY, SBN (CA) 156965  
18 ADMITTED *PRO HAC VICE*  
19 Plaintiff KAREN DI PIAZZA,  
20 Individually and as Natural Mother to CORBIN  
21 JAEGER and as  
22 Executor/Administrator/Representative of the  
23 Estate of CORBIN JAEGER, DECEASED  
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27 rball@robertballapc.com  
28 jdonnelly@robertballapc.com

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1 DATED: October 6, 2020

MCCLESKEY HARRIGER BRAZILL & GRAF LLP

2  
3 By: /s/ Benjamin H. Davidson, II

4 BENJAMIN H. DAVIDSON, II, SBN 05430590  
5 MARY KATHLEEN DAVIDSON, SBN 24070919  
6 Plaintiff KAREN DI PIAZZA,  
7 Individually and as Natural Mother to CORBIN  
8 JAEGER and as  
9 Executor/Administrator/Representative of the  
10 Estate of CORBIN JAEGER, DECEASED  
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12 Lubbock, Texas 79413  
13 Telephone (806) 796-7306; Fax (806) 796-7365  
14 bdavidson@mhbog.com  
15 kdavidson@mhbog.com

16 CERTIFICATE OF SERVICE

17 I hereby certify that the foregoing instrument was electronically filed via the Court's  
18 CM/ECF system and a true and correct copy of same was served via certified U.S. Mail to  
19 all counsel of record in accordance with Federal Rules of Civil Procedure on the 6<sup>th</sup> day of  
20 October, 2020.

21  
22 By: /s/ Robert A. Ball

23 Robert A. Ball, Esquire  
24  
25  
26  
27  
28